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December 14, 1999

K. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

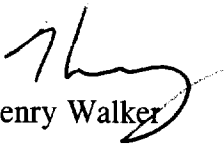
**Re: Petition of The Tennessee Small Local Exchange Company Coalition for  
Temporary Suspension of 47 U.S.C. §251(b) and 251(c) Pursuant to 47  
U.S.C. §251(f) and 47 U.S.C. §253(b)  
Docket No. 99-00613**

Dear David:

Enclosed please find an original and thirteen (13) copies of the Preliminary Issues List of Southeastern Competitive Carriers Association (SECCA) in the above-referenced docket. Copies have been served on all parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

  
Henry Walker

HW/nl  
Enclosure

cc: T.G. Pappas, Esq.

**FILE**

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

IN RE: PETITION OF THE TENNESSEE SMALL LOCAL EXCHANGE COMPANY  
COALITION FOR TEMPORARY SUSPENSION OF 47 U.S.C. §251(b) AND  
251(c) PURSUANT TO 47 U.S.C. §253(b)

DOCKET. NO. 99-00613

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**Preliminary Issues List of SECCA**

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The Southeast Competitive Carriers Association (“SECCA”) submits the following, preliminary list of issues to be addressed in the above-captioned proceeding. This list is based solely on the Petition itself and relevant federal and state laws. As the case develops, SECCA anticipates other issues will arise.

1. Whether each local exchange carrier in the Tennessee Local Exchange Company Coalition (“the Coalition”) can demonstrate by a preponderance of the evidence that compliance with the interconnection obligations of 47 U.S.C. § 251 would be “technically unfeasible,” likely to cause “undue economic burdens beyond the burdens typically associated with efficient competitive entry” or is necessary “to avoid a significant adverse economic impact on users of telecommunications services generally.”
2. Whether each member of the Coalition can demonstrate by a preponderance of the evidence that suspension or modification of the requirements of Section 251 is “consistent with the public interest, convenience and necessity.”

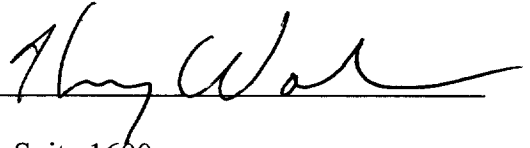
**FILE**

3. Whether each member of the Coalition has "fewer than 2 percent of the Nation's subscriber lines installed in the aggregate nationwide."
4. Whether each member of the Coalition should be made a party to this proceeding.
5. Whether, for purposes of discovery, the presentation of evidence and consideration of the requirements discussed in issues 1, 2, and 3, each member of the Coalition should be considered "on a case-by-case basis."

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

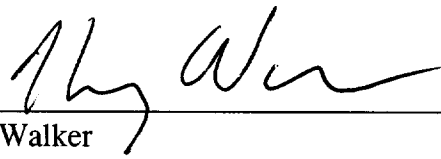
By: \_\_\_\_\_

  
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**CERTIFICATE OF SERVICE**

I, Henry Walker, hereby certify that I have served a copy of the foregoing List of Issues on behalf of Southeastern Competitive Carriers Association to the following on this \_\_\_\_ day of December, 1999.

T.G. Pappas, Esq.  
Bass, Berry & Sims, PLC  
2700 First American Center  
Nashville, TN 37238-2700

  
\_\_\_\_\_  
Henry Walker